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January 17, 2025

VIA ECF

Hon. John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

**APPLICATION GRANTED
SO ORDERED**

1/20/25 
John G. Koeltl, U.S.D.J.

Re: *Thomas R. et al v. Hartford Life and Accident Insurance Company*
Case No.: 1:21-cv-01388-JGK (S.D.N.Y.)

Dear Judge Koeltl:

This office represents Defendant Hartford Life and Accident Insurance Company (“Hartford”) in the above-captioned matter. Pursuant to Your Honor’s Orders dated November 12, 2024 and January 8, 2025, Defendant timely files its Opposition to Plaintiffs’ Motion for Attorneys’ Fees and Costs. (Dkt. Nos. 86 and 98). Defendant hereby moves for leave to file a redacted version of its Opposition to Plaintiffs’ Motion for Attorneys’ Fees and Costs with the amount of the settlement between the parties’ redacted.

Upon reaching a settlement in this case, the Parties mutually agreed that both the Settlement Agreement and the amount of the settlement would be kept confidential with limited exception. Specifically, the Parties agreed that Plaintiffs “may also disclose the amount of the settlement to the Court under seal with [Plaintiffs’] application for costs and attorneys’ fees associated with the Lawsuit.” Because Plaintiffs disclosed the settlement amount in their papers under seal and Defendant must respond to those arguments (Defendants are obligated to keep the settlement amount confidential), Defendant moves to file an unredacted version of their Memorandum of Law in Opposition to Plaintiffs’ Motion for Attorneys’ Fees and Costs under seal and a redacted version of this brief in the public record. The only redaction in this brief is the amount of the settlement.

Pursuant to Your Honor’s Individual Rules, the Parties have met and conferred to narrow the scope of this request as much as possible. The only requested redaction is the amount of the settlement. As such, this requested redaction is narrowly tailored to serve the purpose of maintaining the confidentiality agreement in the Settlement Agreement.

I greatly appreciate your attention to this matter.

Robinson+Cole

Hon. John G. Koeltl

January 17, 2025

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Respectfully submitted,



Matthew P. Mazzola

cc: All Counsel of Record (*via* ECF)